

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

The Authors Guild, Inc., Association of)	
American Publishers, Inc., et al.,)	
)	
Plaintiffs,)	
)	
vs.)	
)	Case No. 05 CV 8136-DC
Google Inc.,)	
)	
Defendant.)	
)	

NOTICE OF INTENT TO APPEAR BY
THE ELECTRONIC PRIVACY INFORMATION CENTER

Pursuant to the Court’s November 19, 2009 Order, Marc Rotenberg hereby serves notice of his intent to appear at the February 18, 2010 Fairness Hearing in the above-captioned matter. Mr. Rotenberg is admitted to practice before this Court, and represents the Electronic Privacy Information Center (EPIC). He is also Adjunct Professor of Law at Georgetown University Law Center, where he has taught the Law of Information Privacy since 1990.

On September 4, 2009, EPIC moved to intervene in this matter. EPIC sought intervention “for the purpose of representing the privacy interests of users of the proposed service now under consideration by the Court,” interests “which have heretofore been unrepresented by any party to this lawsuit.” The Court denied EPIC’s motion, but invited EPIC to participate in this matter as an objector. EPIC filed objections on September 8, 2009. An electronic version of EPIC’s objections was docketed on October 2, 2009.

At the Fairness Hearing, EPIC intends to represent the privacy interests of millions of American Internet users and readers. EPIC will explain how the proposed settlement mandates the collection of the most intimate personal information, threatens well-established standards that safeguard intellectual freedom, and imperils longstanding Constitutional rights, including the right to read anonymously. Furthermore, it threatens to eviscerate state library privacy laws that safeguard library patrons in the United States. EPIC is uniquely qualified to advocate for readers' privacy interests.

/s/ Marc Rotenberg
Marc Rotenberg
(admitted *pro hac vice*)
Counsel of Record
John Verdi
Electronic Privacy
Information Center (EPIC)
1718 Connecticut Ave. NW
Suite 200
Washington, DC 20009
(202) 483-1140

February 3, 2010

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 3, 2010, I caused to be served, by email, copies of the foregoing NOTICE OF INTENT TO APPEAR BY THE ELECTRONIC PRIVACY INFORMATION CENTER upon:

Michael J. Boni

Joanne Zack

Boni & Zack LLC
15 St. Asaphs Road
Bala Cynwyd, PA 19004
Bookclaims@bonizack.com

Jeffrey P. Cunard

Bruce P. Keller

Debevoise & Plimpton, LLP (NYC)
919 Third Avenue
31st Floor
New York, NY 10022
Bookclaims@debevoise.com

Daralyn J. Durie

Joseph C. Gratz

Durie Tangri LLP
332 Pine Street
Suite 200
San Francisco, CA 94104
Bookclaims@durietangri.com